



March 20, 2009

Robin Heard, Director
Easement Programs Division
U.S. Department of Agriculture
Natural Resources Conservation Service
P.O. Box 2890
Washington, D.C. 20013-2890

Dear Director Heard:

The National Association of State Foresters (NASF) represents the directors of the state forestry agencies of all fifty states, the U.S. territories, and the District of Columbia who manage and protect state and private forests across the country. We greatly appreciate the opportunity to provide the following comments on the interim final rules for the Natural Resource Conservation Service (NRCS) Healthy Forests Reserve Program (HFRP) published in the January 14th Federal Register.

Cost-share assistance and easement enrollment provided through HFRP should coincide with priority forest areas or regions identified in the State Forest Resource Assessments and Strategies required by section 8002 of the 2008 Farm Bill. Ranking considerations should prioritize projects which support strategies to enhance biodiversity and carbon storage as identified in the State-wide Strategy. State foresters are to complete the State-wide forest resource assessments and strategies by June 2010. Attention to forest resources in the HFRP should be immediate and not wait for completion of the state-wide assessments.

Over 90 percent of the private forest owners in the U.S. are families, individuals, and other unincorporated groups of individuals that own forest land.¹ Cost-effectiveness considerations should not disadvantage small forest landholdings owned by family forest landowners from participating in HFRP. Cost share assistance such as that provided through HFRP is necessary for private landowners to manage their lands for increased carbon sequestration.

Accomplishing the objectives of HFRP will hinge on the ability of forests to adapt to a changing climate. Cost-share assistance provided through HFRP should help landowners implement adaptation practices that provide habitat and migration corridors needed by endangered and threatened species, improve biodiversity and the ability of forests to sequester and store carbon.

Thank you for considering these recommendations. Please feel free to contact me in the event you have questions.

Sincerely,

Jay Farrell

¹ Butler, Brett J. 2008. Family Forest Owners of the United States, 2006. Gen. Tech. Rep. NRS-27. Newton Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 72 p.